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1 CONNIE KLINE: My name is Connie Kline. I'm representing two groups today, the Ohio Citizens Against a Radioactive Environment and Ohio Care and the Concerned Citizens Network which represents Lake, Ashtabula, Cuyahoga and Geauga counties. We have somewhat of a unique perspective on this hearing. Thank you for this opportunity to provide input on the July 1999 Draft Environmental Impact Statement. I wish to briefly address the so called no action alternative outlined in the EIS. And I quote, "under which DOE would not build a repository at the Yucca Mountain site and despite the 72 commercial and the 5 DOE sites across the U.S. The DOE's preferred alternative is to proceed with a geologic repository and the analyses in this EIS did not identify any potential environmental impacts that would be a basis for not proceeding."

The Concerned Citizens Network and Ohio Care do not advocate for a geologic repository and recognize that hydrogeological uncertainties exist at Yucca Mountain and that transport of radioactive waste poses problems. However, radioactive waste cannot remain at reactor sites which are the least suitable locations from a health, safety, and environmental standpoint for any extended period of time.

U.S. nuclear power plants, all of which are built on potable or environmentally sensitive bodies of water, were never intended as radioactive waste sites, a fact acknowledged by both the NRC and the DOE. The Draft Environmental Impact Statement emphasizes repeatedly, and I quote, "there could be large public health and environmental consequences under the no action alternative. The storage facilities at the 72 commercial and five DOE sites would deteriorate and radioactive contaminants would escape and enter the environment causing widespread contamination to the atmosphere, soil, surface water and ground water at the 77 sites across the United States with resulting human health impacts."

2 One would be hard pressed to find less environmentally suitable sites than Ohio's two  
continued on page 2 reactors, Perry and Davis Besse. Neither of which meet the NRC's minimum criteria for a radioactive waste site in 10CFR61 which, quote, "contains common sense siting requirements that address the natural characteristics of the site and other factors." And these are the factors, the criteria.

One, sites with known natural resources are to be avoided. Both reactors sit on the shores of Lake Erie, part of the world's largest fresh water system and source of drinking water for millions of people in two countries.

Two, a site must be well drained and free of flooding or ponding. Davis Besse is quoted, "located on a 954 acre wetlands marsh in a coastal flood zone." We experienced such a severe flood in 1972 that the entire site, including the operational reactor, were submerged for days and people had to be airlifted or rescued by boat. I have provided photographs to the DOE, although the DOE cannot keep them. The Davis Besse site experiences frequent flooding especially during spring thaws when roads leading to and from the plant are impassable.

Number three, a site must be located far enough above the water table to prevent ground water intrusion. According to the Final Safety Analysis Report for the Perry Plant, quote, "test borings at the Perry site indicate ground water levels ranging from three to five feet below the

ground surface in the main plant area. Within a two mile vicinity of the Perry site, there are 295 shallow residential wells." From testimony in court documents presented during 1986 and '87 hearings in which the State of Ohio vigorously opposed plans to dispose of radioactive waste on site at Davis Besse. Quote, "Toledo Edison verified the extent of the ground water and its permeability. Ground water was released into Lake Erie for the permeable bedrock aquifer that extends into the lake."

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Number four, "Sites with seismic activity and erosion must be avoided. The Perry area is subject to earthquakes like the one that occurred on January 31st, 1986, the epicenter of which was less than 10 miles from the plant and which registered five on the Richter Scale. There are frequent earthquakes of smaller magnitude in the area, and many geologists predict an earthquake of greater magnitude than the Perry plant was built to withstand.

According to the Perry final analysis there is, quote, "an offshore fault intersecting the cooling water tunnels. Huge chasms, 30 feet wide and 20 feet deep in the bedrock running through about two-thirds of the Perry site's excavation was discovered during construction and filled with concrete." Which could further compromise the stability of the site.

Erosion, which is a serious problem at both Perry and Davis Besse, caused an entire park just west of the plant to fall into Lake Erie several years ago and has forced multi-million dollar control projects along the plant shoreline, which has receded to within 250 feet of the closest safety structure at Perry, which is the water pump station.

The environmental impact statements of many reactors were done more than a quarter of a century ago. According to the Army Corps of Engineers, older reactors were licensed under currently outdated environmental guidelines and could not be built on their present sites today. The Solid Waste Division of the Ohio EPA have stated that both the Perry and Davis Besse sites would be deemed unsuitable for an ordinary garbage solid waste facility.

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So, we do not really feel that there's any good option. When I chaired the Ohio Sierra Club's nuclear committee, policies were adopted that, quote, "prohibit the construction of new commercial power plants and extended at radioactive wastes storage or disposal, including dry cask and calling for the phased closure and decommissioning of operating reactors. Which will result in the termination of production of fuel cycle waste and the development and implementation of national and global policies which will curb energy over-use and promote conservation, efficiency, and alternative renewable, non-polluting, non-nuclear energy sources."

The time is long overdue for Congress and the federal government to mitigate the potentially irrevocable damage caused by this unsolvable waste stream. Thank you.